

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
v.)	Civil Action No. 1:13-cv-1999
)	
CONSTRUCT DATA PUBLISHERS a.s., <i>et</i>)	Judge Andrea R. Wood
<i>al.</i>)	
)	
Defendants.)	

**DEFENDANT’S MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSE TO
FEDERAL TRADE COMMISSION’S RENEWED MOTION FOR AN ORDER
HOLDING DEFENDANTS CONSTRUCT DATA AND SUSANNE ANHORN IN CIVIL
CONTEMPT AND/OR FOR SANCTIONS AND ORDERING DEFENDANTS TO
DEPOSIT FUNDS IN COURT REGISTRY**

Defendant Susanne Anhorn (“Defendant”) respectfully requests an extension of time to file her response to the Federal Trade Commission’s Renewed Motion for an Order Holding Defendants Construct Data and Susanne Anhorn in Civil Contempt and/or for Sanctions and Ordering Defendants to Deposit Funds in Court Registry (the “Motion for Contempt”), Dkt. 197. In support of the motion, Defendant states as follows:

1. On January 14, 2016, this Court entered an order giving Defendant until February 22, 2016 to respond to the FTC’s Motion for Contempt and giving the FTC until February 29, 2016 to submit its reply in support of the Motion for Contempt. Dkt. 219.

2. At a status hearing on January 13, 2016, this Court stated that it expected to rule on Defendants Susanne Anhorn and Wolfgang Valvoda’s (“Individual Defendants”) Motion to Modify the Asset Freeze Order, Dkt. 220, in advance of that February 22, 2016 response date. The Motion to Modify the Asset Freeze Order requests that the Court “allow [Individual Defendants] to use their personal funds to pay a specified amount of attorneys’ fees and expenses

to Mayer Brown LLP, for the limited purpose of (1) filing an opposition to the FTC's motion to hold Defendant Anhorn in civil contempt and (2) attempting to settle the FTC's claims against them." Dkt. 220, Ex. B at 1. The motion also suggests that the Court defer briefing on the Motion for Contempt until after Individual Defendants "have exhausted their efforts to settle all of the FTC's claims against them." *Id.* at 2.

3. As of the time of this filing, this Court has not yet ruled on Individual Defendants' Motion to Modify the Asset Freeze Order.

4. Defendants need a ruling on the Motion to Modify the Asset Freeze Order in order to properly respond to the Motion for Contempt.

5. Defendant therefore requests an extension of time, until 14 days after the Court rules on the Motion to Modify the Asset Freeze Order, to file her response to the Motion for Contempt. Additionally, Defendant requests that the FTC be allowed until 21 days after the Court rules on the Motion to Modify the Asset Freeze order to file its reply in support of the Motion for Contempt.

6. This is Defendant's second motion for an extension of time.

7. Prior to filing this motion, counsel for Defendants notified the FTC of the sum and substance of the motion. The FTC took no position at that time and reserved its right to respond.

8. Neither the FTC nor the Court would be prejudiced by this extension of time to file a response to the Motion for Contempt.

WHEREFORE, Defendant respectfully urges this Court to grant an extension of time to file a response to the Motion for Contempt until 14 days after the Court rules on the Motion to

Modify the Asset Freeze Order and a reply in support of the Motion for Contempt until 21 days after the Court rules on the Motion to Modify the Asset Freeze Order.

Dated: February 19, 2016

Respectfully submitted,

By: /s/ Lori E. Lightfoot
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CERTIFICATE OF SERVICE

I, Lori E. Lightfoot, an attorney, hereby certify that on February 19, 2016, I caused the foregoing to be electronically filed with the Clerk of Court by using the CM/ECF system, which will automatically send a notice of electronic filing to all parties.

Dated: February 19, 2016

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